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6 Attorneys for Defendants Keenen Ivory Wayans,  
Shawn Wayans, Marlon Wayans,  
7 Wayans Bros. Productions, and  
SMP, LLC incorrectly named St. Martin's  
8 Press, Inc. (now known as SMP (1952) Inc.)

9  
10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 JARED EDWARDS,

13  
14 Plaintiff

15 vs.

16  
17 KEENEN IVORY WAYANS,  
18 SHAWN WAYANS, MARLON  
WAYANS, WAYANS BROTHERS  
19 PRODUCTIONS, AND ST.  
20 MARTIN'S PRESS, INC.,

21 Defendants.

) CASE NO. 2:10-cv-02231 R (RCX)  
)  
) [Honorable Manuel Real,  
) Courtroom 8, USDC - Central District]  
)  
) **REQUEST FOR JUDICIAL**  
) **NOTICE IN SUPPORT OF**  
) **MOTION FOR SUMMARY**  
) **JUDGMENT FILED BY**  
) **DEFENDANTS KEENEN IVORY**  
) **WAYANS, SHAWN WAYANS,**  
) **MARLON WAYANS, WAYANS**  
) **BROS. PRODUCTIONS AND ST.**  
) **MARTIN'S PRESS, INC.**  
)  
) Date: January 18, 2011  
) Time: 10:00 a.m.  
) Location.: Courtroom 8  
)  
) [Filed Concurrently With Notice of  
) Motion and Motion for Summary  
) Judgment; Statement of Uncontroverted  
) Facts and Conclusions of Law; and  
) Declarations of September Rea, Esq.  
) and Jay S. Glick and Elizabeth Beier]  
)  
)

1 Defendants Keenen Ivory Wayans, Shawn Wayans, Marlon Wayans,  
2 Wayans Bros. Productions, Inc. and St. Martin's Press, Inc., by and through their  
3 attorneys of record, hereby respectfully request that the Court take judicial notice  
4 pursuant to Federal Rules of Evidence 201 and 902(4) of the following matters  
5 submitted in support of their Motion for Summary Judgment

6 1. Plaintiff Jared Edwards filed a Complaint and Demand For Jury Trial  
7 in the United States District Court for the Southern District of New York, Case  
8 NO. 09-CV-10236 on December 17, 2009. A true and correct copy of the  
9 Complaint is attached hereto as **Exhibit "A"**.

10 2. On March 11, 2009, defendants Keenen Ivory Wayans, Shawn  
11 Wayans, Marlon Wayans, Wayans Bros. Productions (improperly named was  
12 Wayans Brothers Productions) (collectively, the "Wayans") filed a Motion to  
13 Transfer the case to the Central District of California pursuant to 28 U.S.C.  
14 1404(a). A true and correct copy of the Motion to Transfer is attached hereto as  
15 **Exhibit "B"**.

16 3. On this same date, the Wayans, by and through their attorneys of  
17 record, filed a Memorandum of Law in support of the Motion to Transfer. A true  
18 and copy of the Memorandum of Law is attached hereto as **Exhibit "C"**.

19 4. On March 12, 2010, the United States District Court Judge ordered  
20 that the case entitled *Jared Edwards v. Keenen Ivory Wayans, et al.*, Case No. 09-  
21 Civ-10263 (CM) be transferred to the Central District of California pursuant to 28  
22 U.S.C. § 1404(a) for substantially the reasons stated in defendants' memorandum  
23 in support of transfer. A true and correct copy of this Order is attached hereto as  
24 **Exhibit "D"**.

25 5. The work entitled "101 Ways to Know You're a Golddigger" was  
26 registered with the United States Copyright Office, Registration No. TX 7-064-  
27 388, effective July 6, 2009 by Keenen Ivory Wayans, Shawn Wayans, and Marlon  
28 Wayans. This record is self-authenticating pursuant to Federal Rule of Evidence

1 902(4). A certified copy of the Certification of Registration is attached hereto as  
2 **Exhibit “E”**.

3 6. The work entitled “You know you’re a Gold Digger when...” was  
4 registered with the United States Copyright Office, Registration No. TXu 1-612-  
5 358, effective August 23, 2009 by Jared Edwards. This record is self-  
6 authenticating pursuant to Federal Rule of Evidence 902(4). A certified copy of  
7 the Certification of Registration is attached hereto as **Exhibit “F”**.

8  
9  
10 Dated: December 17, 2010 FREEDMAN & TAITELMAN, LLP

11 By: /s/  
12 Bryan J. Freedman, Esq.  
13 September Rea, Esq.  
14 Attorneys for Defendants Keenen Ivory  
15 Wayans, Shawn Wayans, Marlon Wayans,  
16 Wayans Brothers Productions, and St.  
17 Martin’s Press, Inc. (now known as SMP)  
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